

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEGACY RESTORATION, LLC,

Plaintiff,

-against-

OSWALDO “JUNIOR” BARAJAS, JOHN DOE ENTITY
1, LEAH RAFFLES, and BRIAN WOLFF,

Defendants.
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Case No.: 1:25-cv-5319 (LJL) (OTW)

**DECLARATION OF
DEFENDANT BRIAN WOLFF IN
OPPOSITION TO
PLAINTIFF’S MOTION
FOR INJUNCTIVE RELIEF**

Brian Wolff declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am a Defendant in the above-referenced case.
2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge.
3. I have no involvement in Southern Roofing (“Southern”) as an employee or otherwise.
4. I only know about the company because my partner in my automobile dealership, Defendant Oswaldo “Junior” Barajas (“Barajas”) owned Southern and sold it almost two (2) years ago to the Plaintiff.
5. I started my own contracting company because I have been flipping and remodeling properties for over ten (10) years to sell or rent.
6. I have no understanding of Southern’s business, period.
7. I can perform any kind of business for my own personal well-being within my company.
8. Barajas has no interest in the company that I formed.

9. Although Defendant Leah Raffles (“Raffles”) has apparently discussed in text messages with her mother the prospect of Barajas becoming an owner of the new construction company, that decision is up to me and I have not made any decision to grant Barajas any equity stake in my new company.

10. Further, I have never discussed any such topics with Raffles.

11. The new company was formed on April 28, 2025 and we have only done one (1) job thus far in Mississippi.

12. Moreover, it is my understanding that Plaintiff’s business consists solely of roofing and gutters, while my business deals with more mechanical trades and general construction.

13. I do not understand why the Plaintiff has taken the step of suing me personally when I owe nothing to it.

14. I started this company with \$15,000.00 for my own personal benefit.

15. I never discussed Plaintiff’s business with Raffles and do not need any of their information to start or grow my business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 3, 2025.

Brian Wolff
Brian Wolff (Jul 3, 2025 10:42 CDT)

Brian Wolff